Congress of the United States

Washington, DC 20510

September 24, 2019

The Honorable Sonny Perdue Secretary of Agriculture U.S. Department of Agriculture 1400 Independence Avenue, S.W. Washington, DC 20250

Dear Secretary Perdue:

We write in opposition to the U.S. Department of Agriculture's (USDA) proposed rule "Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) (84 FR 35570)." Despite the Administration's claim that this rule would "fix a loophole" in eligibility guidelines, this proposal would worsen food insecurity, kicking 3.1 million people off SNAP, and punish working families that are striving towards self-sufficiency. We are especially concerned about the devastating impact that this rule would have on hard working Pennsylvanians, including children, seniors and individuals with disabilities.

In Pennsylvania, SNAP plays a critical role in the battle against hunger for more than 1.8 million children, seniors and families. Pennsylvania is one of more than 40 states currently using the broad-based categorical eligibility (BBCE) option. Under BBCE, Pennsylvania has increased the gross income limit for SNAP eligibility to 160% of the federal poverty guidelines and eliminated SNAP's statutory asset test. Without BBCE, a household can lose substantial SNAP benefits—or benefits entirely—from a modest increase in earnings. By lifting this threshold, SNAP households in Pennsylvania are able to have a gradual phase down of SNAP benefits, which encourages households to pursue higher-paying work while maintaining access to a critical nutrition safety net. Furthermore, enabling SNAP households to possess modest assets allows low-income households to accumulate savings, providing a safeguard for the future.

According to the Pennsylvania Department of Health (DHS), the Administration's proposed rule would jeopardize SNAP benefits for 200,000 Pennsylvanians in more than 120,000 households. This rule will be especially devastating for households with seniors or individuals with disabilities. DHS estimates that of the 120,000 Pennsylvania households impacted by the rule, nearly 84,000 haves a senior or individual with disabilities. For seniors and individuals with disabilities, asset tests can be particularly detrimental. These households may be required to expend their limited resources to be determined eligible for SNAP with a strong unlikelihood of replenishing those minimal assets.

The proposed rule will also have significant economic ramifications in Pennsylvania. In 2017, more than 10,000 authorized Pennsylvanian retailers participated in SNAP, redeeming \$2.7 billion in sales. For every dollar invested in this program, the economy gets \$1.79 in return. SNAP benefits spur \$1.8 billion in local economic activity, and removing hundreds of thousands of low-income households from SNAP would slow the vital economic boost that the program provides. Further, USDA's own estimates show that this rule would be expensive, costing \$2.3 billion to administer, of which half is to be paid for by state governments. DHS estimates that administering this rule would cost Pennsylvania more than \$2 million each year.

We urge the Administration to withdraw this proposed rule immediately. This proposal will hurt hundreds of thousands of Pennsylvanians, increase food insecurity among seniors, children, working families and individuals with disabilities and create an undue administrative burden on our state.

Thank you for your prompt attention to this matter and we look forward to your response.

Sincerely,

Robert P. Casey, Jr. United States Senator

L. Carey,

Madeleine We Madeleine Dean Member of Congress

Matthew A. Cartwright Member of Congress

Conor Lamb Member of Congress

Chrissy Houlahan Member of Congress Mike Doyle

Member of Congress

Susan Wild

Member of Congress

Mary Gay Scanlon

Member of Congress

Dwight Evans

Member of Congress

Brendan F. Boyle

Member of Congress